

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE FOREIGN EXCHANGE
BENCHMARK RATES ANTITRUST
LITIGATION

No. 1:13-cv-07789-LGS

This Document Relates to:

WAH, *et al.* v. HSBC NORTH
AMERICA HOLDINGS INC., *et al.*

No. 1:15-cv-08974-LGS

**DECLARATION OF ANGELA FERRANTE IN
SUPPORT OF JOINT RESPONSE TO THE COURT'S ORDER
REGARDING ELIGIBILITY OF CHAN AH WAH AND LIM CHEOK
KEE WILLY TO SUBMIT A CLAIM IN THE *FOREX* SETTLEMENTS**

I, Angela Ferrante, pursuant to 28 U.S.C. §1746, declare:

1. I am a Senior Vice President, Operations for Garden City Group, LLC ("GCG").
2. The Court authorized GCG to act as the Claims Administrator in connection with the Settlements in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-7789-LGS ("*Forex*"). See ECF Nos. 536, 866, and 882. I have been actively involved in the *Forex* Settlements claims process and have personal knowledge of the matters stated herein. If called upon, I could and would competently testify thereto under oath.
3. On October 17, 2017, GCG received a claim form via info@FXAntitrustSettlement.com signed by Chan Ah Wah ("Mr. Chan"). This claim (Claim No. 1534676) selected "Option 2 (Documented Claim Option)" and stated that Mr. Chan transacted in FX Exchange-Traded Instruments.
4. On November 20, 2017, class counsel forwarded an email from Lim Cheok Kee Willy ("Mrs. Chan", collectively with Mr. Chan, "Chans") to GCG requesting that GCG correct

Mr. Chan's claim form to state that he did not transact in FX Exchange-Traded Instruments. GCG updated Claim No. 1534676 to reflect this change.

5. On November 29, 2017, Mrs. Chan submitted a claim online on behalf of herself (Claim No. 10003612). Mrs. Chan's claim form selected Option 2 and stated that Mrs. Chan did not transact in FX Exchange-Traded Instruments.

6. On November 22, 2017, GCG received copies of the Chans' FX trading records from class counsel. GCG completed a review of the Chans' trading records and found no evidence indicating that the Chans transacted in FX Instruments in the United States or its territories. And, therefore, both claim number 1534676 and claim number 10003612 have been deemed ineligible for payment in these proceedings.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 9, 2018



Angela Ferrante

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

I further certify that I caused the foregoing to be sent via U.S. Mail by depositing a true copy in a postpaid, properly addressed envelope addressed to:

Chan Ah Wah
Lim Cheok Kee Willy
115 East Street
New Hyde Park, NY 11040

And via email to:

Chanjac5@aol.com

s/ Christopher M. Burke
CHRISTOPHER M. BURKE